

Amendments to the Drawings:

The attached drawing sheet includes changes to Figure 1. In Figure 1, three dots have been added between element 10 and element 20 to indicate that two or more elements can be used.

REMARKS/ARGUMENTS

In the Office Action mailed November 22, 2010, claims 1-18 were rejected. In response, Applicant has amended claims 1, 15. Claims 16-18 have been canceled. Applicant hereby requests reconsideration of the application in view of the amendments and the below-provided remarks.

Objections to the Drawings

The Office Action cites that the drawings must show every feature of the invention in the specified claims and the Office Action requires that the “at least two oscillators” must be shown or the feature canceled from the claim. Applicant respectfully asserts that Fig. 1 shows the “at least two oscillators.” In fact, Fig. 1 shows two programmable ring oscillators 10, 20 (see Fig. 1 and par. [0024] of the published application U.S. Pat. Pub. No. 2007/0127610 A1). However, in order to expedite prosecution, Applicant has amended Fig. 1 to include two or more oscillators. Support for this amendment can be found in Applicant’s specification at, for example, par. [0005] of the published application. Accordingly, Applicant respectfully requests that the objection to the drawings be withdrawn.

Objections to the Specification

Regarding the Office Action’s suggestion to add section headings, Applicant respectfully declines because the indicated suggestions in 37 C.F.R. § 1.77(b) are not statutorily required for filing a non-provisional patent application, but are only guidelines that are suggested for Applicant’s use. The section headings are not mandatory, and in fact when Rule 77 was amended in 1996 (61 FR 42790, Aug. 19, 1996), Bruce A. Lehman, Assistant Secretary of Commerce and Commissioner of Patents and Trademarks, stated in the Official Gazette:

“Section 1.77 is permissive rather than mandatory. ... 1.77 merely expresses the Office's preference for the arrangement of the application elements. The Office may

advise an applicant that the application does not comply with the format set forth in 1.77, and suggest this format for the applicant's consideration; however, the Office will not require any application to comply with the format set forth in 1.77.”

In view of the above, Applicant prefers not to add section headings.

Claim Rejections under 35 U.S.C. 112

Claims 1-18 were rejected under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention.

In particular, claim 1 was rejected because it is allegedly unclear which frequency the limitation “value of said frequency” is referring to. Claim 1 has been amended to recite “said each frequency.” Claim 15 has similarly been amended.

Claims 16-18 have been canceled.

Claims 2-14 depend from claim 1.

Accordingly, Applicant respectfully requests that the rejection of claims 1-18 under 35 U.S.C. 112, second paragraph, be withdrawn.

CONCLUSION

Generally, in this amendment and response, Applicant has not raised all possible grounds for (a) traversing the rejections of the Office action or (b) patentably distinguishing any new claims (i.e., over the cited references or otherwise). Applicant however, reserves the right to explicate and expand on any ground already raised and/or to raise other grounds for traversing and/or for distinguishing, including, without limitation, by explaining and/or distinguishing the subject matter of the application and/or any cited reference at a later time (e.g., in the event that this application does not proceed to issue with the claims as herein amended, or in the context of a continuing application). Applicant submits that nothing herein is, or should be deemed to be, a disclaimer of any rights, acquiescence in any rejection, or a waiver of any arguments that might have been raised but were not raised herein, or otherwise in the prosecution of this application, whether as to the original claims or as to any of the new claims, or otherwise. Without

limiting the generality of the foregoing, Applicant reserves the right to reintroduce one or more of the original claims in original form or otherwise so as to claim the subject matter of those claims, both/either at a later time in prosecuting this application or in the context of a continuing application.

Applicant respectfully requests reconsideration of the claims in view of the amendments and remarks made herein. A notice of allowance is earnestly solicited.

At any time during the pendency of this application, please charge any fees required or credit any over payment to Deposit Account **50-4019** pursuant to 37 C.F.R. 1.25. Additionally, please charge any fees to Deposit Account **50-4019** under 37 C.F.R. 1.16, 1.17, 1.19, 1.20 and 1.21.

Respectfully submitted,

/mark a. wilson/

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